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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

JASON NAYA-ROMEU,

Plaintiff,

vs.

EQUIFAX INFORMATION SERVICES LLC;
NATIONAL CONSUMER TELECOM &
UTILITIES EXCHANGE, INC.; INNOVIS
DATA SOLUTIONS, INC.; DIRECTV, LLC;
SYNCRONY FINANCIAL dba SYNCB/CARE
CREDIT and SYNCB/MATTRESS FIRM
EVENT; and SILVER STATE SCHOOLS
CREDIT UNION,

Defendants.

Case No.: 2:22-cv-00580-JCM-DJA

**JOINT MOTION TO EXTEND
DEADLINE TO RESPOND TO
PLAINTIFF'S COMPLAINT (FIRST
REQUEST)**

Plaintiff, Jason Naya-Romeu ("Plaintiff"), and Defendant, DIRECTV, LLC ("Defendant")
(collectively "Parties"), by and through their counsel of record, hereby stipulate and agree as
follows:

On April 7, 2022, Plaintiff filed his Complaint [ECF No. 1]. Defendant was served with
Plaintiff's Complaint on April 11, 2022. The deadline for Defendant to respond to Plaintiff's
Complaint is May 2, 2022. The Parties have discussed extending the deadline for Defendant to
respond to Plaintiff's Complaint to allow for better investigation of the allegations and discuss
possible resolution of the matter.

WHEREAS, the Parties hereby stipulate and agree to extend the deadline for Defendant to
file its responsive pleading to Plaintiff's Complaint to June 1, 2022.

This is the first motion for an extension of time for Defendant to file its responsive

pleading. The extension is requested in good faith and is not for purposes of delay or prejudice to any other party.

As part of this motion, Defendant agrees to participate in any Rule 26(f) conference that occurs during the pendency of this extension.

DATED this 2nd day of May, 2022.

WRIGHT, FINLAY & ZAK, LLP

FREEDOM LAW FIRM

/s/ Ramir M. Hernandez

/s/ Gerardo Avalos

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Attorneys for Defendant, DIRECTV, LLC

Attorneys for Plaintiff, Jason Naya-Romeu

IT IS SO ORDERED:



UNITED STATES MAGISTRATE JUDGE

DATED: May 3, 2022

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I am an employee of WRIGHT, FINLAY & ZAK, LLP and that I served the foregoing **JOINT MOTION TO EXTEND TIME TO RESOND TO PLAINTIFF'S COMPLAINT (FIRST REQUEST)** on the 29th day of April, 2022, to all parties on the CM/ECF service list.

/s/ Lisa Cox

An Employee of WRIGHT, FINLAY & ZAK, LLP